

April 26, 2000

Mr. William Rabung  
U.S. Department of Labor  
Employment and Training Administration  
Office of Workforce Security  
200 Constitution Avenue NW  
Room S4231  
Washington D.C. 20210

RE: Comments on WIASRD, Quarterly Summary Report and the Annual Report

Dear Mr. Rabung:

Thank you for the opportunity to comment concerning the new management information and reporting system. I hope the following comments will assist the Department in improving this important policy.

**Data Requirements for Clients Receiving Core Services**

We agree with the Department's approach to make the number of data elements collected commensurate with the intensity of service. We believe a small change to the required data elements for those receiving core services will substantially improve state flexibility in designing customer friendly systems.

Required data elements for those receiving core services should be coordinated with the data items required for the Wagner-Peyser system. This would involve dropping only a few WIA data elements (such as limited English language and single parent) and would allow use of current Wagner-Peyser based systems to track information for those receiving only WIA funded core services. The items dropped could still be required for clients moving on to intensive or training services.

Requiring the same data elements for Wagner-Peyser and WIA core services will also facilitate a seamless delivery system. Different data requirements create the absurd situation that if a Wagner-Peyser funded staff person provides an identical core service as a WIA funded staff person, the amount and type of data that must be collected is different. It is this type of requirement that creates the seams in our delivery system. DOL can assist states in the creation of sensible Onestop delivery systems by aligning the reporting requirements of WIA core and Wagner-Peyser services.

## **Customer Satisfaction Survey**

On September 7, 1999 in a letter to Eric Johnson I voiced my concerns about the Department's proposed approach to customer satisfaction surveys as described in "Consultation Papers on Performance Accountability under Title I of the Workforce Investment Act of 1998". It does not appear that the concerns raised during the early implementation period have been dealt with.

While the draft notes the Annual Report is to include *Progress of local areas in the State in achieving performance measures including the core indicators of performance and the customer satisfaction indicators*, the remaining direction of the draft seems to ignore the need to measure customer satisfaction in a manner that is valid at the local level.

This places states in an awkward position. If phone surveys are done with validity at the local level, costs could easily exceed the costs that were experienced under JTPA for phone follow-up surveys when you consider the need to also survey employers. This would nullify the supposed savings to be achieved by using wage records instead of follow-up surveys. If more economical mail surveys are used for local level customer satisfaction measurement, then the phone surveys required to be valid at the state level will be a complete duplication of the extensive data gathering done by mail. The administrative costs of maintaining two separate sampling systems, assuring there is no duplication between the two systems (so the same clients do not receive a mail and phone survey), and the operation of two separate systems also needlessly adds to state administrative costs. The cost estimates for customer satisfaction surveys are greatly underestimated when you consider the Annual Report requirement for local customer satisfaction measurement.

Indiana has done customer satisfaction surveying of employment and training customers since 1986. During this time, mail surveys have been implemented to reduce data gathering costs. To assure validity, telephone survey results were compared with mail survey results and the results were found to be comparable. We propose that mail surveys of customers be allowed for the purpose of measuring local and statewide customer satisfaction.

## **Employer Sample for Customer Satisfaction Measurement**

The draft appears to be inconsistent about which employers should be surveyed. Attachment V says "Employers who directly benefit from Title I-funded services during the program year are eligible for the survey." Later in the same attachment it describes employers eligible for surveying as "All employers who have received a substantial service involving personal contact with One-Stop staff..." In the first case WIA Title I funding is a condition, while the second example could include services funded by any One-Stop partner.

While it is clearly the intent of the policy to create customer satisfaction information that can be compared at the state and national level, the specifications will not achieve that goal. Comparing results using common questions and minimum response rates become invalid when different populations of employers are surveyed by different states.

If surveying employers who directly benefit from Title I-funded services is to be required, the cost of creating local and state data collection systems should be included in the cost estimates since existing systems do not collect this information. It should also be considered that many local programs do not provide WIA Title I funded services to employers.

### **Additional Financial Reporting Requirements**

WIA Sec. 185(g) clearly states “In requiring entities to maintain records of costs by category under this title, the Secretary shall require only that the costs be categorized as administrative or programmatic costs.” To meet the draft requirements for the Annual Report it would be necessary to maintain fiscal records at the local and state level by the four additional categories of self-service/informational, core, intensive and training. The substantial increase in reporting burden is not reflected in the cost estimates for the Annual Report and it appears this requirement would be directly at odds with the Act.

We look forward to working with the Department in creating efficient data systems that provide the information needed to maintain system accountability. I hope these comments further that goal.

Sincerely,

Craig E. Hartzer  
Commissioner

CEH/RL